Jeremiah F. Hallisey, Esq. Hallisey & Johnson, P.C. 465 California Street, Suite 405 San Francisco, CA 94104 Tel: (415) 433-5300

Fax: (415) 230-5792 Email: jhallisey@gmail.com Francis O. Scarpulla, Esq. Law Offices of Francis O. Scarpulla 456 Montgomery Street, 17<sup>th</sup> Floor San Francisco, CA 94104 Tel: (415) 788-7210

Fax: (415) 788-0706 Email: fos@scarpullalaw.com

June 6, 2020

## VIA ECF

The Honorable Joseph Donato
United States District Court Judge
United States District Court
Northern District of California
450 Golden Gate Avenue, Courtroom 11
San Francisco, CA 94102

Re: <u>In re PG&E Corporation and Pacific Gas and Electric Company</u> USDC/NDCA Case No. 19-cv-05257 JD

## Dear Judge Donato:

During the Plan confirmation hearing before Judge Montali yesterday, the Court asked whether the Plan could be confirmed before Your Honor issued an order on the total estimated damages suffered by the fire victims, an issue which is pending before Your Honor from a reference from the bankruptcy court. (Doc. Nos. 1, 2.) Judge Montali opined that it would be acceptable to him if any interested party were to contact Your Honor in an effort to ascertain when such an estimated total damages amount might be forthcoming.

While neither the Debtors nor the TCC has produced any admissible evidence to support the alleged \$13.5 billion damages number, Certain Fire Victims did submit evidence that the total damages exceeded that amount by about \$7 billion for property damages only. (Doc. Nos. 306, 306-1, 307, 344, 379, 380.) What is important is that the fire victims, many of whom have been waiting for almost three years to get paid for the losses the Debtors caused, obtain at least \$13.5 billion in real value.

Thus, we respectfully request that Your Honor file what Your Honor calculates from the evidence supplied to the Court to be the total cash damages suffered by the fire victims so that amount can be used in the Plan confirmation hearings which are currently on-going.

Respectfully yours,

/s/ Jeremiah F. Hallisey

/s/ Francis O. Scarpulla

Jeremiah F. Hallisey

Francis O. Scarpulla

cc: All Counsel of Record (via ECF)